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7 *Attorneys for Plaintiff*

8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA

11 Y. HATA & CO., LIMITED, on behalf of
12 itself and all others similarly situated,

13 Plaintiff,

14 v.

15 AIR FRANCE-KLM; BRITISH AIRWAYS,
16 PLC; ASIANA AIRLINES, INC.; NIPPON
17 CARGO AIRLINES CO., LTD.; JAPAN
18 AIRLINES INTERNATIONAL CO., LTD.;
19 CATHAY PACIFIC AIRWAYS LTD.;
20 DEUTSCHE LUFTHANSA AG;
21 SCANDANAVIAN AIRLINES SYSTEMS;
22 UNITED AIRLINES, INC.; UAL CORP.;
23 CARGOLUX AIRLINES
24 INTERNATIONAL SA; LAN AIRLINES
25 SA; POLAR AIR CARGO, INC.; ATLAS
26 AIR WORLDWIDE HOLDINGS, INC.;
27 KOREAN AIRLINES CO., LTD.;
28 SINGAPORE AIRLINES, LTD.; ACE
AVIATION HOLDINGS, INC.; AIR
CANADA; AMERICAN AIRLINES, INC.;
AMR CORPORATION; SINGAPORE
AIRLINES CARGO PTE LTD.; and
VIRGIN ATLANTIC AIRWAYS LTD.

Defendants.

Case No.: C06-01916 SC

CLASS ACTION

**STIPULATION AND ~~[PROPOSED]~~
ORDER AMENDING CASE
MANAGEMENT ORDER AND ADR
DEADLINES**

Assigned to The Honorable Samuel Conti

1 Plaintiff respectfully requests that this Court enter an order extending the time in which to
2 comply with the Court's initial order regarding the Case Management and ADR deadlines until
3 the Judicial Panel on Multidistrict Litigation ("JPML") rules on a motion pending in *In re Air*
4 *Cargo Shipping Services Antitrust Litigation* (MDL No. 1775) and a consolidated complaint is
5 filed by all Plaintiffs in the single transferee Court and served on Defendants. Defendants Air
6 France-KLM, Japan Airlines International Co., Ltd., Singapore Airlines, Ltd., and Singapore
7 Airlines Cargo PTE Ltd., have consented to the requested extensions. In support of this Motion,
8 Plaintiff states:

9 1. The Complaint in this matter was filed on March 13, 2006. It seeks relief under
10 the Sherman Act and the Clayton Act against 20 defendants on behalf of a putative class.

11 2. More than 50 similar actions have been filed in various jurisdictions around the
12 country.

13 3. Plaintiffs in various Districts have filed motions to consolidate the cases and the
14 JPML is currently considering the motions to consolidate, in a matter captioned *In re Air Cargo*
15 *Shipping Services Antitrust Litigation*, MDL No. 1775.

16 4. On May 4, 2006, plaintiff served all defendants with Notice(s) of Lawsuit and
17 Request for Waiver of Service of Summons.

18 5. Some, but not all, the defendants in this case have accepted service by executing
19 a Waiver of Service of Summons. Some may contest service. Accordingly, all parties have not
20 had an opportunity to meet and confer regarding ADR and Case Management issues. The last
21 day for plaintiffs to effectuate service of the complaint is July 11, 2006.

22 WHEREFORE, plaintiff requests that this Court grant an extension to the following
23 deadlines until the JPML rules on the motion pending in *In re Air Cargo Shipping Services*
24 *Antitrust Litigation* (MDL No. 1775):

25 1. The parties are to meet and confer regarding initial disclosures, early settlement,
26 ADR process selection, and discovery plan by June 21, 2006;

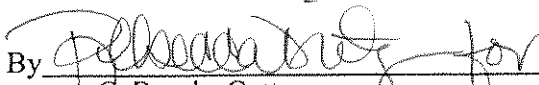
27 2. The parties are to file a Joint ADR Certification with Stipulation to ADR Process
28 or Notice of Need for ADR Phone Conference by June 21, 2006;

3. The parties are to complete initial disclosures or state objection in Rule 26(f) Report, file Case Management Statement, and file/serve Rule 26(f) Report by July 5, 2006; and

4. The Case Management Conference is scheduled for July 28, 2006.

DATED: June 21, 2006


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DATED: June 20, 2006

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*Attorneys for Defendant Japan Airlines
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DATED: June ____, 2006

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Attorneys for Defendant Air France-KLM

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4. The Case Management Conference is scheduled for July 28, 2006.

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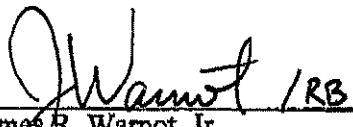
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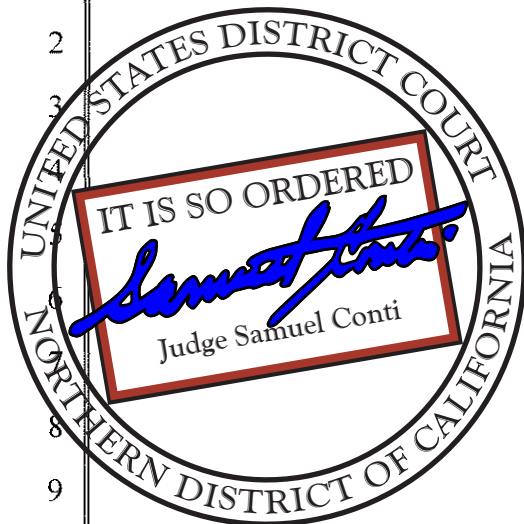
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1 DATED: June ____, 2006

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*Attorneys for Defendants Singapore Airlines, Ltd.
and Singapore Airlines Cargo PTE Ltd.*

10 **IT IS SO ORDERED.** Case Management Conference continued to 9/22/06 at 10:00a.m.

12 DATED: 6/26/06

13 _____
The Honorable Samuel Conti
UNITED STATES DISTRICT COURT